

Appl. No. 09/921,856
Amdt. dated Aug. 6, 2004
Reply to Office Action of Apr. 7, 2004
Docket No. BOC9-2000-0082 (217)

REMARKS/ARGUMENTS

These remarks are made in response to the final Office Action of April 7, 2004 (Office Action). As this response was not filed within the three-month statutory period, a one month extension of time is herein requested.

As an initial matter, Applicants wish to express their sincere thanks to the Examiner for taking time to discuss this application by telephone on August 5, 2004, with Applicants' representative. The claim amendments contained herein reflect that discussion.

In paragraph 3 of the Office Action, claims 1-17 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2002/0023230 to Bolnick, *et al.* (Bolnick) in view of U.S. Publication No. 2002/0016857 to Harari (Harari).

A brief review of Applicants' invention may be helpful prior to addressing the rejections on the art. Applicants have invented a method, system, and apparatus for facilitating the establishment of relationships between different parties. Applicants' invention facilitates establishment of these relationships by identifying and listing contacts, such as social and/or business contacts, that are shared by the parties. The parties, however, are unlikely to be aware of any specific contacts that they have in common. As expressly stated at page 7 of the specification, identifying common contacts shared by the parties can enhance each parties knowledge about the other and engender a sense of trust among them, thereby fostering a relationship.

In one embodiment, contact lists of different users can be compared with one another to determine whether the users associated with the contact lists have any acquaintances or contacts in common with one another. In another embodiment, mutual contacts of different users can be identified despite the fact that such mutual contacts are known through several "degrees of separation." Accordingly, Applicants' invention can analyze at least two unique contact lists, each of which corresponds to a different user. The lists of contacts specified in one or more of the "original" contact lists can be retrieved and then compared with one or more contact lists associated with yet another party. In this manner, multiple contact lists can be processed to determine whether two parties are connected through, or know, "friends of friends." Applicants' invention thus enables the parties to find out who the other parties are that are contacts of both

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the parties, thereby providing insight about the respective parties and possibly engendering a sense of trust between them. A list of the parties' common contacts can be generated and stored once the common contacts have been identified.

Each of the independent claims, Claims 1, 4, 6, 7, 15, and 17, have been amended to clarify features of Applicants' invention. These amendments are supported in the specification and do not introduce new matter.

With respect to the rejections on the art, the first reference, Bolnick, is directed to a system and method for sharing personalized information among a plurality of users. In Bolnick, for example, different families "can share selective portions of an up-to-date calendar, address/phone book, and to-do list" as well as send inter-family messages. (p. 8, paragraphs 163-164.) The calendar, address/phone book, and list in Bolnick can also be updated. (See, e.g., p. 8, paragraph 167; "a change in a shared phone listing can be seen by all members who are linked to that phone listing.") None of Bolnick's features, however, are comparable to Applicants' invention, which includes the comparing of two distinct contact lists and generating from that comparison a separate list of common contacts.

Bolnick only provides users with common access to data, such as a phonebook shared via a Website. The Applicants' invention, as claimed, takes one set of contacts associated with one party and compares that set with a different set of contacts associated with a different party. Bolnick does not teach or suggest that one contact list can be compared with another contact list. Moreover, Bolnick nowhere suggests a comparison of distinct sets corresponding to different users.

In paragraphs 167-171, Bolnick discloses that a party may have an "associations" section that includes information regarding businesses and organizations with whom the party associates. Additionally, paragraphs 068-070 of Bolnick teach that access to this information can be shared through a variety of different mechanisms. But although Bolnick teaches that association information can be included for users of the Web site, Bolnick no where even suggests determining whether two different users have any contacts in common. It follows, therefore, that Bolnick does not teach making such a determination based upon a comparison of distinct sets of contacts associated with different parties.

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As claimed, the Applicants' invention compares one distinct set of retrieved contacts with a different set of contacts that is stored locally. Additional contacts also can be retrieved from yet another exposed, remotely accessible contact list associated with one of the first retrieved contacts. Thus, after retrieving a first set of contacts from an exposed, remotely accessible contact list, other contacts are retrieved from another exposed, remotely accessible contact list that corresponds to a contact in the first set of retrieved contacts. Applicants' invention accordingly allows a user to identify contacts common between two users, for example friends of friends, in the case where the users do not know one another. Bolnick is not configured to nor intended to perform such a task. It follows that Bolnick does not teach or suggest such a step.

Harari, also previously cited, fails to cure the deficiencies of Bolnick. Harari discloses an address server system that provides for automatic updating of contact information. Harari, like Bolnick, however, fails to teach or suggest that distinct contact lists associated with different users can be compared so as to identify common contacts. Harari also does not identify common contacts between a second distinct set of compared contacts. This contrasts with Applicants' invention, which as already noted can identify "friends of friends". Thus not only does Harari fail to teach or suggest comparing steps, but Harari also is incapable of operating on this second layer to identify "friends of friends".

Harari discloses that a server-based determination of determine whether one version of contact information is newer than another version of contact information for a same user. Paragraph 43 of Harari discloses that this enables a user to obtain up-to-date contact information, but Harari does not teach or suggest generating a distinct set of common contacts among different users based upon a comparison of distinct sets of contacts associated with each user. Applicants' invention does not update contact lists, but instead compares various contact lists to identify whether contacts are held in common between two different entities.

Each of the independent claims includes recital of one aspect of Applicants' invention, namely the comparison of distinct sets in order to identify common contacts contained in both, as well as the generation of a distinct set comprising only the elements common to both sets. It follows that Bolnick and Harari, both singly and jointly, fail to teach or suggest the features recited in independent Claims 1, 4, 6, 7, 12, 15, 17 as amended. Accordingly, withdrawal of the

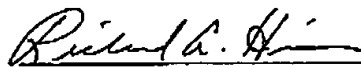
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35 U.S.C. § 103(a) rejection with respect to each of the independent claims is respectfully requested. Since each of the dependent claims recite yet additional features, the withdrawal of the 35 U.S.C. § 103(a) rejection with respect to each of these dependent claims is also respectfully requested.

The Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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